



RESPONSE TO HER MAJESTY'S INSPECTORATE OF CONSTABULARY (HMIC) REPORTS

Revisiting Police Relationships (integrity)

Response to the national report published in December and in particular the findings in relation to Lancashire.

In 2011, the Home Secretary asked Her Majesty's Inspectorate of Constabulary (HMIC) to look at "instances of undue influence, inappropriate contractual arrangements and other abuses of power in police relationships with the media and other parties".

The resulting report, *Without Fear or Favour*, found no evidence that corruption was endemic in police service relationships; however, it did not issue a clean bill of health. In particular, HMIC was concerned that few forces provided any policy or guidance in relation to social media, and what second jobs are suitable for officers and staff. The report made several recommendations to help the service address these issues.

In 2012 HMIC revisited all forces to track progress against these recommendations. A copy of the resulting reports – "Revisiting Police Relationships Progress Report – Lancashire"; and "Revisiting Police Relationships Progress Report" were published on 19 December 2012. The findings for Lancashire were largely positive, outlining improvements made and action taken since the previous review; however HMIC consider that progress nationally has been inconsistent and too slow. [A copy of the reports can be found on the HMIC website.](#)

Clive Grunshaw responded:

"I welcome HMIC's report "Revisiting Police Relationships: a progress report" published in December 2012. I am pleased to note that the Inspectors found no areas of major concern at Lancashire Constabulary and welcome the approach the Constabulary has taken in conducting its own integrity 'health check' which has resulted in numerous actions for improvements.

HMIC highlighted particular concern over inappropriate behaviour by officers on social media sites such as Facebook and Twitter. Three such matters highlighted for Lancashire Constabulary have been referred back to the Professional Standards Department (PSD).

Upon taking office in November 2012, one of the first priorities was to establish an independent Audit Committee to provide both myself and the Chief Constable with advice on all matters of audit and corporate governance. The Committee comprises four independent people with extensive experience of governance and audit and a good knowledge of the Constabulary's processes. The terms of reference for the Committee include a commitment "to review the findings of any examinations by regulatory agencies". The first meeting of the newly established Committee took place on 25 February 2013 and HMIC's inspection reports were considered at that meeting ([view agenda and minutes here](#)). I am confident that the Audit Committee will provide an open and transparent oversight of governance arrangements, the appropriateness of policies, arrangements relating to declarations of interest; gifts and hospitality and business interests.

As Police and Crime Commissioner it is my responsibility to set high standards in the way I operate and to demonstrate this in my values and behaviour. I have sworn an oath of office to act with integrity and impartiality, and the Policing Protocol establishes that I will observe the Nolan principles of standards in public life.

Strong leadership is a core part of my Police and Crime Plan and I will exercise this by providing clearly defined direction for the police force, holding the Chief Constable to account and playing a leading role in partnerships and the community. In undertaking this role, I will actively promote high ethical standards.

I am reviewing my corporate governance arrangements including delegations and financial regulation which will further strengthen controls including those around procurement and gifts and hospitality.

The Professional Standards Department (PSD) established a Force Integrity Group to address the recommendations in the HMIC report "Without fear or favour" around the lack of clarity on the acceptance of gifts and hospitality and conflicts of interest arising from officers and staff having second jobs or other business interests.

A clear ethical governance framework is now established within the Force, which is monitored and controlled by the PSD. The purpose of this framework of policies and standards is to ensure that police officers and staff understand the behaviours expected of them in order to ensure that they do not discredit or behave in such a way as to undermine public confidence in the Force.

In addition to updating the policies and procedures relating to gifts and hospitality, a force electronic database has been developed to ensure that there is a clear and transparent audit trail of gifts and hospitality offered and accepted or declined. This central database will additionally allow PSD to monitor individual entries to ensure that there is consistent application of the policy.

Internal Audit provided substantial assurance for the system of internal control over the recording and monitoring of gifts and hospitality and the proper recording of declaration of interests at the meeting of the Audit Committee on 25 February 2013. Internal Audit will continue to monitor progress throughout 2013.

I will continue to ensure that effective scrutiny of the HMIC recommendations are put in place; the establishment of scrutiny arrangements are currently developed in liaison with the Constabulary. This could include the possibility of:

- dip-sampling gifts and hospitality registers;
- reviewing secondary employment / business interests as part of the "personal development review" processes
- developing a structured training programme; including integrity training and current and future senior leaders

The combined Audit Committee will continue to receive updates / reports on activity.

I will continue to ensure robust oversight and governance over police integrity issues in Lancashire and will continue to work with the Constabulary to ensure recommendations are implemented.

CLIVE GRUNSHAW